

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK DIVISION**

IN RE: PROTON-PUMP INHIBITOR PRODUCTS LIABILITY LITIGATION (NO. II) This Document Relates to: ALL ACTIONS	2:17-md-2789 (CCC)(MF) (MDL 2789) NOVEMBER 5, 2018 STATUS CONFERENCE JOINT STATUS REPORT AND PROPOSED AGENDA
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Pursuant to Case Management Order No. 28 (Dkt. No. 264), the parties hereby submit their Joint Status Report and Proposed Agenda in advance of the November 5, 2018 Status Conference.

I. STATUS REPORT

Since the last status conference, the parties have submitted and the Court has entered Case Management Order: No. 28 (on the September 21, 2018 Status Conference). Pursuant to CMO No. 28, the parties have continued to confer on various discovery issues and will be prepared to discuss the status of these discussions at the next conference.

At the time of this filing, approximately 2586 potentially related actions with 2617 plaintiffs are pending in federal court.

Currently, approximately 92 potentially related state court actions with 92 plaintiffs are pending in the Delaware Superior Court, New Castle County, before Judge John A. Parkins, one related state court action with 3 plaintiffs is pending in the Missouri Circuit Court, Twenty-Second Judicial Circuit (City of St. Louis) before Judge Michael K. Mullen, and one related state court action with 1 plaintiff is pending in Texas State District Court, Travis County.

II. PROPOSED AGENDA FOR NOVEMBER 5, 2018 STATUS CONFERENCE

The Parties have met and conferred and propose the following Agenda:

- The parties' positions on *Lexecon*;
- Update on Discovery
 - Plaintiffs' Requests for Depositions of Defense Witnesses under CMOs 17-20;
 - Production of Clinical Documents and Data; and
 - Privilege Log Issues.

III. TELEPHONIC MONITORING OF THE CASE MANAGEMENT CONFERENCE

As instructed by the Court, counsel has arranged for a telephonic conference line so interested attorneys can monitor the proceedings. Dial-in information is as follows:

Dial In: (888) 808-6929

Access Code: 9945288#

Note that the status conference is scheduled to begin at 1 p.m. eastern.

Dated: November 1, 2018